

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

BRUCE RHYNE and JANICE  
RHYNE,

Plaintiffs,

v.

Civil Action No.: 3:18-cv-00197

UNITED STATES STEEL  
CORPORATION, et al.,

Defendants.

**THE SAVOGRAN COMPANY’S NOTICE OF JOINDER IN THE MOTIONS  
TO EXCLUDE OR LIMIT THE TESTIMONY, OPINIONS AND REPORTS OF  
PLAINTIFFS’ EXPERTS DRs. HARRISON, GORE, INFANTE, HERRICK, AND PETTY  
PURSUANT TO FEDERAL RULE OF EVIDENCE 702 AND DAUBERT AS FILED BY  
DEFENDANTS UNITED STATES STEEL CORPORATION AND SAFETY-KLEEN, INC.**

Defendant THE SAVOGRAN COMPANY (“Savogran”) respectfully notifies this Honorable Court and all parties that it joins and simultaneously moves for an Order pursuant to Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), excluding the testimony, opinions, and reports of Plaintiffs’ experts Drs. Harrison, Gore, Infante, Herrick, and formerly designated expert Petty, at the trial of this action on and after July 6, 2020. Savogran joins in and adopts those arguments of United States Steel Corporation, Inc. and Safety-Kleen, Inc. made in their own separate and joint motions to exclude identified below, as more specifically set forth in the electronic record in this action, incorporated herein by reference as if fully set forth in this filing:

1. Defendant United States Steel Corporation’s Motion to Exclude Plaintiffs’ Expert Steven D. Gore, M.D. (Docket Nos. 182-183);

2. Defendants United States Steel Corporation's and Safety-Kleen Systems Inc.'s Joint Motion to Strike the Opinions and Report of Stephen Petty, PE, CIH (Docket Nos. 184-185);
3. Defendant United States Steel Corporation's Motion to Exclude The Testimony, Opinions and Report of Dr. Peter Infante (Docket Nos. 186-187);
4. Defendant United States Steel Corporation's Motion to Exclude or Limit The Testimony, Opinions and Reports of Plaintiffs' Expert Robert Harrison, M.D. (Docket Nos. 188-189);
5. Defendant Safety-Kleen Systems, Inc.'s Motion To Exclude The Testimony, Opinions, and Report of Dr. Steven Gore (Docket Nos. 190-191);
6. Defendant Safety-Kleen Systems, Inc.'s Motion To Exclude The Testimony, Opinions, and Report of Dr. Robbert [sic] Harrison (Docket Nos. 192 and 194);
7. Defendant Safety-Kleen Systems, Inc.'s Motion To Exclude The Testimony, Opinions, and Report of Dr. Peter Infante (Docket Nos. 195-196); and
8. Defendants Safety-Kleen Systems, Inc. and United States Steel Corporation's Joint Motion To Exclude The Testimony, Opinions, And Report Of Dr. Robert Herrick (Docket Nos. 197 and 201).

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Respectfully submitted, this 7th day of April, 2020.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, April 7, 2020, I filed the foregoing **THE SAVOGRAN COMPANY'S NOTICE OF JOINDER** with the Court using the CM/ECF system, which will serve all counsel of record.

By: /s/ Brian M. Ledger

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